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10          Attorney for *Mario Castro*

11           **UNITED STATES DISTRICT COURT**

12           **DISTRICT OF NEVADA**

13          UNITED STATES OF AMERICA,  
14           Plaintiff,  
15           v.  
16          MARIO CASTRO,  
17           Defendant.

18           Case No. 2:19-cr-00295-GMN-NJK

19           **SEVENTH STIPULATION TO  
20           MODIFY CONDITIONS OF  
RELEASE**

21          IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson  
22          United States Attorney, and Department of Justice Trial Attorney Timothy T. Finley, counsel  
23          for government, and Richard E. Tanasi, counsel for defendant Mario Castro, that Mr. Castro's  
24          conditions of release be modified to permit him to visit his elderly mother at his co-  
25          defendant/brother's home.

26          This Stipulation is entered into for the following reasons:

27          1.       On August 18, 2020, the parties stipulated to Mario Castro's temporary pretrial  
28          release based, in part, on Mr. Castro's health condition and the transmission of COVID-19 at  
29          the Nevada Southern Detention Center. ECF No. 134. The parties proposed several conditions  
30          for Mr. Castro's release. *Id.*

1       2. On August 26, 2020, the Court granted Mr. Castro's pretrial release on  
2 conditions, one of which required him to maintain employment. ECF No. 137 and 141 at p. 5.

3       3. Defendant Mario Castro and Defendant Miguel Castro are brothers. Their  
4 mother is 93 years old. She recently injured her hip. She is recovering at Defendant Miguel  
5 Castro's home. Defendant Mario Castro requests permission to visit his mother at co-defendant  
6 Miguel Castro's home twice per week for two hours each time.

7       4. Counsel for Mr. Castro has contacted his supervising pretrial services officer, Officer  
8 McKillip, who has no objection to Mr. Castro's request. The government also does not oppose  
9 this request.

10      DATED this 8<sup>th</sup> day of March 2023.

11      By /s/ Richard Tanasi

12      RICHARD TANASI  
Counsel for Defendant

11      By /s/ Timothy T. Finley

12      TIMOTHY T. FINLEY  
Counsel for Government

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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
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v.  
MARIO CASTRO,  
Defendant.

Case No. 2:19-cr-00295-GMN-NJK

## **PROPOSED ORDER**

MARIO CASTRO,  
Defe

Pending before the Court is the parties' seventh stipulation to modify conditions of pretrial release. The parties ask the Court to modify Defendant's pretrial release conditions to permit him to visit his mother at co-defendant Miguel Castro's home twice per week for two hours each time. The parties submit that Defendant's Pretrial Services Officer does not object to this request.

IT IS ORDERED that the parties' stipulation, is hereby GRANTED.

DATED this 8 day of March 2023.

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**UNITED STATES DISTRICT COURT JUDGE**

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1                   CERTIFICATE OF ELECTRONIC SERVICE

2                   The undersigned hereby certifies that he is an employee of Tanasi Law Offices for the  
3 District of Nevada and is a person of such age and discretion as to be competent to serve papers.

4                   That on March 8, 2023, he served an electronic copy of the above and foregoing  
5 **SEVENTH STIPULATION TO MODIFY CONDITIONS OF RELEASE** by electronic  
6 service (ECF) to the person named below:

7  
8                   CHRISTOPHER CHIOU  
9                   Acting United States Attorney  
10                  DANIEL E. ZYTNICK  
11                  TIMOTHY FINLEY  
12                  U.S. Department of Justice  
13                  450 5th Street N.W. #6400  
14                  Washington, DC 20044

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14                  /s/ *Richard Tanasi*  
15                  Employee of the Tanasi Law Offices